## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS GALVESTON DIVISION

ERG RESOURCES, LLC.	§	C.A. NO. 10-237	
	§	JURY DEMANDED	
Plaintiff	§		
	§		
VS.	§	<u>KENNETH M. HOYT</u>	
	§	Judge	
	§		
STOKES & SPIEHLER ONSHORE, INC.	§	C. Carnew	
	§	Case Manager Court Reporter	
	§		
Defendant	§		
		Proceeding	

## DEFENDANT'S STOKES & SPIEHLER ONSHORE, INC.'S PROPOSED QUESTIONS FOR VOIR DIRE EXAMINATION

- 1. Does anyone have experience with the oil and gas industry?
- 2. Does anyone have relatives or close friends who work, or have worked, in the oil and gas industry?
- 3. Does anyone have experience with the drilling of wells, whether it be oil, gas, or water?
- 4. Does anyone have relatives or close friends who work, or have worked, in the drilling of wells, whether it be oil, gas, or water?
- 5. Does anyone have experience with the Plaintiff, ERG Resources, LLC.?
- 6. Does anyone here know Scott Wood?
- 7. Does anyone here know Phil Jewett?
- 8. Does anyone have experience with the Defendant, Stokes & Spiehler Onshore, Inc.?
- 9. Does anyone here know Bruce Jordan?
- 10. Does anyone here know Sid Ruiz?
- 11. Does anyone here know counsel for Plaintiff, John Zukowski, Pascal Piazza, or Matt Noll?
- 12. Does anyone here know Plaintiff's retained expert, Bill Pattillo?

- 13. Does everyone here understand that the plaintiff has the burden to prove that Stokes breached the standard of care as part of its case?
- 14. Does everyone here understand that the Plaintiff must also prove that if Stokes did breach some standard of care that breach must have resulted in some damage to Plaintiff?
- 15. Does anyone here have a problem in holding the Plaintiff to its burden of proof, in all areas, and if it is unable to sustain its burden of proof in any area, to award it nothing?
- 16. Does anyone here believe that simply because plaintiff has filed a lawsuit that there must be something to it?

Respectfully submitted,

TEKELL, BOOK, ALLEN & MORRIS, L.L.P.

WILLIAM BOOK

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OF COUNSEL: TEKELL, BOOK, ALLEN & MORRIS, L.L.P.

ATTORNEY IN CHARGE FOR DEFENDANT STOKES & SPIEHLER ONSHORE, INC.

## CERTIFICATE OF SERVICE

I hereby certify that on the 8<sup>th</sup> of July, 2011, a true and correct copy of the foregoing instrument was forwarded via U.S. mail and/or hand delivery to the following counsel:

John M. Zukowski Pascal P. Piazza Matthew T. Noll Zukowski, Bresenhan & Sinex, L.L.P. 1177 West Loop South, Suite 1100 Houston, Texas 77027

WILLIAM BOOK